

Ahilan T. Arulanantham (SBN 237841)
arulanantham@law.ucla.edu
CENTER FOR IMMIGRATION LAW AND
POLICY, UCLA SCHOOL OF LAW
385 Charles E. Young Dr. East
Los Angeles, CA 90095
Telephone: (310) 825-1029

Emilou MacLean (SBN 319071)
emaclean@aclunc.org
Michelle (Minju) Y. Cho (SBN 321939)
mcho@aclunc.org
Amanda Young (SBN 359753)
ayoung@aclunc.org
ACLU FOUNDATION
OF NORTHERN CALIFORNIA
39 Drumm Street
San Francisco, CA 94111-4805
Telephone: (415) 621-2493
Facsimile: (415) 863-7832

Attorneys for Plaintiffs
[Additional Counsel Listed on Next Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, MARIELA
GONZÁLEZ, FREDDY JOSE ARAPE RIVAS,
M.H., CECILIA DANIELA GONZÁLEZ
HERRERA, ALBA CECILIA PURICA
HERNÁNDEZ, E.R., HENDRINA VIVAS
CASTILLO, A.C.A., SHERIKA BLANC, VILES
DORSAINVIL, and G.S.,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA,

Defendants.

Case No. 3:25-cv-01766-EMC

**DECLARATION OF Y.V. IN SUPPORT OF
PLAINTIFFS' MOTION FOR
COMPLIANCE WITH COURT ORDER**

Additional Counsel for Plaintiffs

1 Jessica Karp Bansal (SBN 277347)
jessica@ndlon.org
2 Lauren Michel Wilfong (*Pro Hac Vice*)
lwilfong@ndlon.org
3 NATIONAL DAY LABORER
ORGANIZING NETWORK
4 1030 S. Arroyo Parkway, Suite 106
Pasadena, CA 91105
5 Telephone: (626) 214-5689

6 Eva L. Bitran (SBN 302081)
ebitran@aclusocal.org
7 ACLU FOUNDATION
OF SOUTHERN CALIFORNIA
8 1313 West 8th Street
Los Angeles, CA 90017
9 Telephone: (213) 977-5236

10 Erik Crew (*Pro Hac Vice*)
ecrew@haitianbridge.org
11 HAITIAN BRIDGE ALLIANCE
4560 Alvarado Canyon Road, 1H
12 San Diego, CA 92120
Telephone: (949) 603-7411
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DECLARATION OF Y.V.

I, Y.V., declare:

1. I am a TPS recipient under the 2021 designation for Venezuela. I have lived in the United States since 2018 and I currently reside in Dallas, Texas.
2. In April, I re-registered for TPS pursuant to the January 17, 2025 extension of TPS. I received a receipt confirming my re-registration on April 12, 2025.
3. I have worked for a wine bottling company for the last three years. On Friday, I got a call from the human resources department of my company. The person I spoke with told me that I would be fired from work as of September 10, 2025, when my work permit based on TPS expired.
4. Later that afternoon, after Judge Chen's order was published, I called my human resources department back and explained that the court decision should mean that the January extension of TPS is again in effect, and that my work authorization remains valid. They said they would have to check with the attorneys to see if I would be able to maintain my employment after Wednesday.
5. I went to work on Monday and again spoke with someone from HR. I was told that, in spite of Judge Chen's order, the company will not allow me to work beyond Wednesday unless the USCIS website is updated. As of today, the website still says TPS is terminated. As a result, the human resources department at my company is telling me that tomorrow will be my last day at work.
6. I don't know how I will continue without work. I feel depressed and hopeless.
7. This declaration was read to me in full in Spanish on September 9, 2025, by Emilia Garcia. I completely understand the content of this declaration.

I declare under penalty of perjury that the foregoing is true and correct. Executed on September 9, 2025 at Dallas, Texas.



Y.V.

CERTIFICATE OF INTERPRETATION

I, Emilia Garcia, certify that I am fluent in Spanish and English and that I am competent to interpret between these languages. I further certify that I have read the foregoing to Y.V. in Spanish. I further declare that I am competent to render this interpretation and that I would testify to the same under the penalty of perjury if I were called upon to do so.

Date: September 9, 2025



Emilia Garcia

CERTIFICATE OF SERVICE

I hereby certify that on September 9, 2025, I caused the foregoing to be electronically filed with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record.

ACLU FOUNDATION OF NORTHERN
CALIFORNIA

/s/ Emilou MacLean